

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE**

**WILLIAM DEREK RUSSELL,  
Deceased, by next of kin, Z.R., a minor,  
By next friends, CINDY FAWVER and  
FRANK RUSSELL,**

**Plaintiffs,**

**v.**

**Case No.: 2:22-CV-86**

**PHOENIX REDEVELOPMENT BRISTOL, LLC.,**

**Defendant.**

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**STIPULATION OF EXTENSION OF TIME FOR DEFENDANT  
PHOENIX REDEVELOPMENT BRISTOL, INC. TO FILE ITS RESPONSIVE  
PLEADING TO PLAINTIFFS' COMPLAINT**

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IT IS HEREBY STIPULATED by the undersigned parties, through their respective counsel, and pursuant to Local Rule 12.1(a), that Defendant Phoenix Redevelopment Bristol, LLC., shall have an additional twenty-one (21) days, from the original twenty-one (21) day deadline of September 23, 2022, within which to respond to Plaintiffs' Complaint. Therefore, the last day for Defendant Phoenix Redevelopment Bristol, LLC. to respond to Plaintiffs' Complaint shall be October 14, 2022.

Respectfully submitted this 21<sup>st</sup> day of September, 2022:

/s/ F. Braxton Terry  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2022, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ Andrew N. Firkins  
Clint J. Woodfin (BPR# 016346)  
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